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TENNESSEE REGULATORY AUTHORITY

460 James Robertson Parkway
Nashville, Tennessee 37243-0505

MEMORANDUM

To: Sharla Dillon, Docket Manager
From: Ron Jones, Director
Re: Docket No. 03-00633 - In Re. Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives Request for Suspension of Wireline to Wireless Number Portability Obligations Pursuant to Section 251(F)(2) of the Communications Act of 1934, as Amended.
Date: May 18, 2004

Attached is a printed electronic mail correspondence I received on May 14, 2004. Certain portions of this correspondence may be construed as an ex parte communications prohibited by section 4-5-304 of Tennessee Code Annotated. Therefore, pursuant to section 4-5-304(e), I ask that the attached correspondence from W. Chris Jones, Regional Director External Affairs for Verizon Wireless, be placed in the docket file for Docket No. 03-00633 and state that I have not sent any written or oral responses to this correspondence. In addition, I request that you send a copy of this memorandum and attachments thereto to the parties of record.

From: <W Jones@verizonwireless.com>
To: <Ron Jones@state.tn.us>
Date: 5/14/04 2:06:58 PM
Subject: LNP Preparedness/News Release

> Dear Commissioner Jones

>

>

> Monday, May 24, 2004 promises consumers even more choice in the selection
> of wireless services. On that day, the second phase of Local Number
> Portability (LNP) takes effect where consumers across the country should
> be able to move to the wireless carrier of their choosing and bring their
> existing mobile number with them.

>

> Verizon Wireless, the nation's largest wireless service provider, has been
> working diligently for nearly two years to bring number portability to
> business and individual consumers. Following are a few examples of the
> actions taken to ensure a successful transition for the second phase of
> LNP:

>

> * Staffed up its Customer Service Center which handles LNP
> activity in Murfreesboro, TN

> * Trained its 41,000 employees on the porting process

> * Reached out to other carriers in markets affected by LNP with offers
> of testing, training, etc.

> * Called on the FCC and states to hold local and regional carriers
> accountable for their role in the porting process.

>

> While Verizon Wireless has worked to lead the industry to ensure a smooth
> transition, we are concerned that due to lack of readiness by some
> carriers some customers, particularly in smaller rural markets will face
> porting delays or obstacles, that will likely result in customer
> complaints to state agencies and the FCC. We are advising customers that
> in some instances it may take more time to complete than the FCC's porting
> objectives of 3 hours for wireless to wireless porting and 4 days for
> wireline to wireless porting. Verizon Wireless' website at
> www.verizonwireless.com also has significant materials to inform customers
> on the porting process, which will allow them to check porting eligibility
> before starting the process at a retail store.

>

> Our biggest concern is that the patchwork quilt of LNP availability
> created by State Commissions which have granted over 300 waivers for ILECs
> in at least 19 states. More than 150 additional waiver requests are
> pending in over 15 states. This patchwork will undoubtedly cause
> confusion to customers, and frustration by customers who are denied the
> opportunity to port. Verizon Wireless is providing its LNP Customer
> Service representatives with as many tools and lists as possible to
> provide accurate information on porting availability to customers but the
> tracking of this type of information on a state-by-state basis is
> extremely difficult and is wrought with possibilities for error and
> misunderstanding.

>

> For your information, attached are two news releases we have issued
> recently in markets which will soon be eligible for LNP. Also, please
> know we are ready to assist with any complaints that may be referred to

> your offices
>
> Please contact me at 678-339-4260 if you have any questions.
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>
> Sincerely,
>
> W Chris Jones
> Regional Director External Affairs
>
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>
> <<LNP Phase2 - Preparedness Release1.doc>> <<LNP Regional
> CarriersFINAL doc>>
>

NEWS RELEASE



www.verizonwireless.com

FOR IMMEDIATE RELEASE

May 6, 2003

MEDIA CONTACT:

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Verizon Wireless

908.306.4824

Jeffrey.Nelson@verizonwireless.com

Verizon Wireless Continues to Make Preparations and Work with Smaller Carriers to Help Prepare Industry for May 24 National Local Number Portability Deadline

Six Months After the Initial Phase of Number Portability, Verizon Wireless is Prepared for Porting in All Markets in the United States

BEDMINSTER, NJ – On May 24, 2004, Americans from coast to coast can switch their wireless service provider without changing their telephone numbers. Known as local number portability (LNP), this event requires wireless service providers carriers to cooperate for the good of the customer – from the national wireless carriers to the smaller regional players in the industry. Verizon Wireless, the nation's largest wireless service provider, has been working diligently for nearly two years to bring number portability to business and individual consumers, and has incorporated lessons learned from working with the large wireless carriers for the November 2003 initial rollout of LNP in the top 100 markets into its preparedness planning for May 24, 2004. And while all of the large service providers have been actively switching customers since November 2003, Verizon Wireless has been working with the smaller regional wireless service providers to help ensure they too are prepared to provide easy, automatic barrier-free porting

Verizon Wireless has led the industry in demonstrating a commitment to ensuring quick and easy barrier-free porting for customers on several fronts by installing the necessary technology infrastructure

to enable porting, working with other service providers to make it easy and quick for customers to port, investing in in-depth training of customer service call center and Communications Store personnel, and enhancing the Verizon Wireless Web site with detailed information about LNP and how it works. Verizon Wireless has also developed an infrastructure to support all billing and point of sales systems and integrated LNP into all of its business processes.

From individual customers wanting to switch to the nation's leading wireless service provider, to large business customers ready to switch thousands of lines, Verizon Wireless is ready to facilitate the porting process. The company has specialized teams in place to ensure large businesses making the switch to the nation's largest, and most reliable wireless network have a custom plan to execute large-scale porting for employees at a single site or multiple locations throughout the nation.

An integrated project team has been working together for more than two years to identify and upgrade every aspect of the company's operations to ensure that the Verizon Wireless network continues to be the most reliable network in the country. Each of the established systems – from billing to customer service to activation and call routing – has been readied and is prepared to handle requests from consumer and business customers wanting to switch their service provider.

For the past year, the company has trained its 41,000 employees, including nearly 1,000 employees in its Customer Service Center in Murfreesboro, Tenn , on the porting process so that all customers porting into or out of Verizon Wireless will have a consistent experience. Each of the employees at the Murfreesboro Customer Service Center, the hub of the company's porting activities, are specialists in the switching process and will track porting requests, troubleshoot any issues with a porting request and call customers to resolve any hiccups in the porting process.

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"As evidenced during the first phase of number portability in November 2003, Verizon Wireless has led the industry in demonstrating a commitment to ensuring barrier-free porting for customers," said Lowell McAdam, executive vice president and chief operating officer at Verizon Wireless. "No matter where a customer lives – a major urban city or small rural town – or who they have wireless service from, beginning on May 24 they can change wireless service providers while keeping their phone numbers."

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About Verizon Wireless

Verizon Wireless is the nation's leading provider of wireless communications. The company has the largest nationwide wireless voice and data network and 39 million customers. Headquartered in Bedminster, NJ, Verizon Wireless is a joint venture of Verizon Communications (NYSE:VZ) and Vodafone (NYSE and LSE: VOD). Find more information on the Web at www.verizonwireless.com. To receive broadcast-quality video footage of Verizon Wireless operations, log onto www.thenewsmarket.com/verizonwireless.

NEWS RELEASE



www.verizonwireless.com

FOR IMMEDIATE RELEASE
May 10, 2004

MEDIA CONTACT:
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VERIZON WIRELESS URGES THE FCC AND STATES TO PROTECT CONSUMERS' RIGHT TO SWITCH TELECOM COMPANIES WHILE KEEPING THEIR PHONE NUMBERS

*Federal and State Governments Should Ensure Simple, Fast Switching for Consumers as
May 24 Approaches*

Bedminster, NJ – With less than two weeks to go until all wireless and wireline telephone customers should be able to switch service providers while keeping their phone numbers, Verizon Wireless, operator of the nation's most reliable wireless network, today urged federal and state officials to ensure that all companies are in compliance with federal law. By seeking special waivers or simply not putting new systems and operations into place, some companies are now embarking down a road that would, in effect, hold their customers hostage by not allowing their customers to switch service providers by the May 24, 2004 deadline set forth by the Federal Communications Commission (FCC). The initial phase of the FCC's mandate went into effect in the top 100 markets in the United States in November 2003.

The Cellular Telecommunications and Internet Association (CTIA) and member carriers including Verizon Wireless have offered assistance and guidance to regional carriers implementing local number portability (LNP) for the first time this May. Verizon Wireless has

reached out to regional carriers to coordinate testing and has offered training assistance for regional service providers on the porting process. The company is concerned that some carriers are refusing to share basic porting information and to engage in testing, with only a very small portion of regional telecommunications companies actively testing their porting processes with other companies. Verizon Wireless noted that no carrier has an excuse for not being ready by May 24, especially given the extra time the FCC provided for preparation outside the largest markets. The ability to change service providers while keeping phone numbers is turning out to be a huge consumer benefit, and no company should deny their customers the freedom to take their numbers with them

The FCC and the courts have spoken loudly and clearly about the importance of number portability for competition and consumer protection. The FCC also agreed with Verizon Wireless that porting should be quick and easy for customers. In contrast, many state regulatory commissions are considering granting last minute suspensions to regional wireline providers. A patchwork of non-compliant or excused carriers will make porting more complicated for customers and carriers – and undermine the consumer protection and competition benefits offered by LNP.

A letter dated May 6, 2004 from the FCC's Chief of Consumer and Governmental Affairs Bureau, K. Dane Snowden, to the National Association of Regulatory Utility Commissioners' President, Stan Wise, further stresses the importance of LNP readiness by rural carriers and encourages state commissions "to hold carriers that seek waivers of their porting obligations to the appropriate standard of review." Calling for the protection of all consumers' rights, Mr. Snowden added, "If relief were to be granted in the absence of extraordinary circumstances, or for indefinite periods, it would be a setback for rural

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consumers "

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